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Attorneys for Defendant
ENTERPRISE TRUST COMPANY

UNITED STATES DISTRICT COURT
CV 08
NORTHERN DISTRICT OF CALIFORNIA

TRADERIGHT CORP. d/b/a TRADERIGHT
SECURITIES, INC., ENTERPRISE TRUST
COMPANY, and LOCKE HAVEN, LLC,

Defendants.

**DECLARATION OF REBECCA
TOWNSEND IN SUPPORT OF NOTICE OF
REMOVAL PURSUANT TO 28 U.S.C. §
1441(b) (DIVERSITY)**

DECLARATION OF REBECCA TOWNSEND

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2
3 I, Rebecca Townsend, declare as follows:

4 1. I am Vice President, and the main client manager, of Defendant Enterprise Trust
5 Company; and, I am one of the four members of Defendant Locke Haven, LLC. I am familiar with the
6 accounts of Plaintiff Ruthe P. Gomez, at issue in this action. I make this Declaration of my personal
7 knowledge and, if called upon as a witness, could and would testify competently, under oath, to the
8 facts contained herein.

9 2. Defendant Enterprise Trust was at the time of the filing of this action, and still is at the
10 time of the filing of the Notice of Removal, a corporation organized under the laws of Nevada, and has
11 its principal place of business in Henderson, Nevada.

12 3. Defendant Locke Haven, LLC was at the time of the filing of this action, and still is at
13 the time of the filing of the Notice of Removal, a limited liability corporation organized under the laws
14 of the State of Illinois, and has its principal place of business in Lockport, Illinois.

15 4. Defendant Locke Haven, LLC is made up of four members: George Dragel, Mike
16 Rukujzo, John H. Lohmeier and me. I have personal knowledge that all four of us are citizens of the
17 State of Illinois. None of us is a citizen of the State of California.

18 5. The total value of Plaintiff Gomez's accounts at issue in this proceeding equals
19 approximately \$900,000.

20
21 Executed on January 15, 2008, at Oak Brook, Illinois.

22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct.

24
25 
26 Rebecca Townsend